

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

RUSSELL, *et al.*,  
*Plaintiffs,*

v.

HARRIS COUNTY, TEXAS, *et al.*,  
*Defendants.*

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Case No. 4:19-cv-00226  
(Class Action)

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**DECLARATION OF PEARLAND CHIEF OF POLICE JOHNNY SPIRES**

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1. My name is Johnny Spires, I currently serve as Chief of the Pearland Police Department. I have served in this role since June 1, 2017.
2. As Chief for the Pearland Police Department I lead a department of 240 personnel.
3. It is my understanding that the Plaintiffs in this lawsuit are seeking an order releasing over 4,000 felons from the Harris County Jail. It is also my understanding that they seek to release all inmates 55 or older, regardless of the crimes for which he or she is charged or consideration of their prior criminal history. This specific population includes extremely violent individuals whose release would pose a serious threat to their victims, victims' families, and the communities at large.
4. Based on my training, experience, and understanding of the current circumstances on the ground throughout the State, I believe that such releases would strain the already limited law enforcement resources and pose a danger to Texans including the citizens of Pearland.
5. This pandemic is like nothing we have ever seen before but releasing potentially dangerous felons cannot serve the public at large.

6. I believe if released, these felons would endanger their communities that stretch the limited resources of police departments, putting a bigger strain on the community. Although Pearland is in Harris, Brazoria, and Ft. Bend Counties, 41 percent of all our arrests are from Houston. If released, many of these accused will re-offend in our city and further tap our already strained resources.
7. It is my understanding that misdemeanor offenders have already been released and the jail is nearly void of these offenders. It is my belief that these offenders will already create a strain on my Departments resources as many of them will re-offend.
8. It is my belief that a mass release of felons into the community, some of them violent and/or habitual, without an assessment by a judge, will be a detriment to the community. It is also my belief that releasing these felons would further intensify the public's anxiety which is already at a high level due to the COVID-19 Pandemic.
9. In closing, I respectfully urge the Court to disallow any release without individual judicial review and if release is approved, to require COVID-19 testing to ensure we are not releasing infected individuals into the public.

Date: 3-31-2020

  
[Signature]